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July 29, 2005

**VIA EMAIL AND OVERNIGHT DELIVERY**

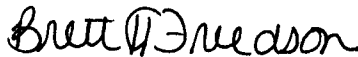
Mary Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station  
Boston, Massachusetts 02110

Re: D.T.E. 04-33: Petition of Verizon New England Inc. for Amendment to Interconnection Agreements with Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Massachusetts, Pursuant to Section 252 of the Communications Act of 1934, as Amended, and the *Triennial Review Order*

Dear Ms. Cottrell:

The Competitive Carrier Coalition, the Competitive Carrier Group and AT&T Communications of New England, Inc. hereby submit this Motion for Extension of Judicial Appeal Period in the above-captioned proceeding. Enclosed for filing please find an original and seven (7) copies of this Motion, a duplicate and a self-addressed, postage-paid envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided. Please feel free to contact me at (202) 887-1211 if you have any questions or require further information.

Respectfully submitted,



Brett Heather Freedson

cc: Service List, D.T.E. 04-33

**Before the  
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Verizon New England Inc. for )  
Arbitration of an Amendment to Interconnection )  
Agreements with Competitive Local Exchange ) D.T.E. 04-33  
Carriers and Commercial Mobile Radio Service )  
Providers in Massachusetts Pursuant to Section )  
252 of the Communications Act of 1934, as )  
Amended, and the *Triennial Review Order* )

**MOTION FOR EXTENSION OF JUDICIAL APPEAL PERIOD**

The Competitive Carrier Coalition,<sup>1</sup> the Competitive Carrier Group<sup>2</sup> and AT&T Communications of New England, Inc. (the “Parties”), pursuant to G.L. c. 25, § 5, hereby respectfully request that the Massachusetts Department of Telecommunications and Energy (the “Department”) grant an extension of the judicial appeal period in the above-captioned proceeding until twenty (20) days after the Department issues its decision on any motions for reconsideration of its July 14, 2005 Arbitration Order.

Concurrent with this Motion, the Parties filed with the Department an Assented-To Motion for Extension of Time to file motions for reconsideration of the Department’s July 14, 2005 Arbitration Order in the above-captioned proceeding. As required by the Department’s procedural rules, 220 C.M.R. § 1.02(5), the Parties demonstrated to the Department that good cause exists to extend, until August 24, 2005, the current deadline for filing motions for

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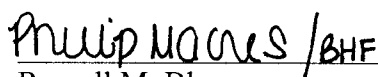
<sup>1</sup> The Competitive Carrier Coalition includes: CTC Communications Corp.; DSLNet Communications, LLC; Focal Communications Corporation of Massachusetts, Lightship Telecom, LLC; RCN-BecoCom LLC; and RCN Telecom Services of Massachusetts, Inc.

<sup>2</sup> The Competitive Carrier Group includes: A.R.C. Networks Inc. d/b/a InfoHighway Communications Corporation; Broadview Networks Inc. and Broadview NP Acquisition Corp.; Cleartel Telecommunications, Inc. f/k/a Essex Acquisition Corp.; DIECA Communications Inc. d/b/a Covad Communications Company; DSCI Corp., IDT America Corp.; KMC Telecom V, Inc.; and XO Communications Services, Inc. (formerly XO Massachusetts, Inc. and Allegiance Telecom of Massachusetts, Inc.).

reconsideration, and further, that no party to the above-captioned proceeding would be prejudiced by the extension of time requested. Therefore, the corresponding extension of the judicial appeal period requested by this Motion is necessary to prevent premature judicial appeal of matters that may resolved through further proceedings before the Department.<sup>3</sup>

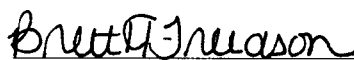
WHEREFORE, the Parties respectfully request that the Department grant this Motion for Extension of Judicial Appeal Period.

Respectfully submitted,

 /BHF

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*Counsel to the Competitive Carrier Coalition*



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<sup>3</sup> *Investigation by the Department of Telecommunications and Energy on its Own Motion into the Appropriate Pricing, based upon Total Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts, D.T.E. 01-20, Order on Motions Filed by Verizon for Extension of Compliance Filing Date and Time for Filing Petitions for Reconsideration, and to Extend the Judicial Appeal Period; by the CLEC Coalition for Extension of Time for Filing Petitions for Reconsideration until After Verizon's Compliance Filing and Leave to Electronically File Any Such Motions; and by WorldCom for the Immediate Adoption of Interim Rates (Jul. 30, 2002) at 16 (The Department granted an extension of the judicial appeal period until twenty (20) days after the Department issued its decision on any motions for reconsideration, concluding that such action "could prevent an appeal that may be avoided by further proceedings at the Department").*

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Dated: July 29, 2005